

EXHIBIT A

Scope Division Among Official Committee of Tort Claimants' Financial Advisors

Lincoln	DSI
Review and analyze the Debtors' operations and businesses and financial projections, including but not limited to, financial condition, business plan strategy, operating forecasts, cash flow projections, and budgets.	Advising the TCC and Counsel regarding the tort claims process, filing and processing of tort claims and estimation of tort claims.
Review, analyze and monitor DIP financing and other financing alternatives.	Claims Management including establishing procedures for claims processing and coordination with claimants.
Assist with the review and calculation(s) of the cost/benefit analysis with respect to the affirmation or rejection of any executory contracts (including, but not limited to, power purchase agreements)	In connection with the estimation of tort claims and claims-related issues, advise the TCC with respect to formulation of a plan and disclosure statement provisions as well as plan feasibility that involve the foregoing.
Analyze proposed sale(s) of core / non-core assets of the Debtors, the terms thereof and options and issues relating thereto, including strategic alternatives available to the Debtors.	Participate in meetings / calls with the Debtors, creditors, other committees, the U.S. Trustee, and other parties in interest and professionals hired by the same, as requested.
Determine a theoretical range of values for the Debtors on a going concern basis as well as any securities to be issued or distributed in connection with the Chapter 11 Cases, including without limitation any securities to be distributed under a plan of reorganization.	Perform such other tasks as may be agreed to by DSI and directed by the TCC or order of the Court having jurisdiction over the TCC

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Assist the TCC in developing, evaluating, structuring and negotiating the terms and conditions of a restructuring, plan of reorganization, disclosure statement, or sale transaction(s), including the value of the securities, if any, that may be issued to the TCC under any such restructuring, plan of reorganization, or sale transaction.	Assist the TCC with its communications website as required by Section 1102 of the Bankruptcy Code.
Analyze any new debt or equity capital (including advice on the nature and terms of new securities).	
Provide analysis on illustrative claim recoveries.	
Assist the TCC in responses / objections to Bankruptcy Court motions.	
Attend meetings and assist in discussions with the Debtors, secured and unsecured creditors, other Official Committee(s), the U.S. Trustee, other parties in interest and professionals hired by the same, as requested.	
Assist the TCC in negotiations with all case participants (including, but not limited to, Debtors, secured and unsecured creditors, other Official Committee(s), State of California, California Public Utilities Commission, power purchase agreements, among other parties), as requested.	
If requested by the legal counsel to the TCC, prepare report(s) with respect to any and all proposed financings, the valuation of the company (as a going concern or otherwise), or proposed merger, divestiture, joint-venture, or investment transaction.	

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Provide testimony in connection with Lincoln Advisors' provision of any of the above-mentioned services in the Bankruptcy Court or other court.	
Render such other general investment banking or financial advisory assistance as the TCC may reasonably request that is consistent with the role of Lincoln Advisors' role financial advisor(s) and not duplicative of services provided by other professionals retained by the TCC.	
Review and advise on the Debtors' real estate portfolio and evaluate leases for optimization/rejection and any proposed real estate sales or financings.	
Assist counsel with advising the TCC on tax issues relating to the Debtors.	
Monitor the Debtors' liquidity including evaluation of critical vendor payments and other key payments.	
Review of statements of financial affairs, schedules of assets and liabilities and related documents and report to the TCC as appropriate.	